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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

11 CISCO SYSTEMS, INC.,) Case No. 5:14-cv-05344-BLF (PSG)
12 Plaintiff,)
13 v.)
14 ARISTA NETWORKS, INC.,)
15 Defendant.)
16)
17)

) **DECLARATION OF JOSHUA GLUCOF**
) **ON BEHALF OF NONPARTY JUNIPER**
) **NETWORKS, INC. IN SUPPORT OF**
) **CISCO SYSTEMS, INC.'S**
) **ADMINISTRATIVE MOTION TO FILE**
) **DOCUMENTS UNDER SEAL RE: DKT.**
) **NO. 323**
)
) Judge: Hon. Beth Labson Freeman
)
)

1 **DECLARATION OF JOSHUA GLUCOFT**

2 I, Joshua Glucoft, declare as follows:

3 1. I am an attorney at the law firm of Irell & Manella LLP, counsel for non-party
 4 Juniper Networks, Inc. (“Juniper”) with respect to the third-party subpoena served by defendant
 5 Arista Networks, Inc. (“Arista”) in the above-captioned matter. I am a member in good standing
 6 of the State Bar of California and have been admitted to practice before this Court. Where
 7 expressly indicated, I have personal knowledge of the facts set forth in this Declaration and, if
 8 called as a witness, could and would testify competently to such facts under oath.

9 2. I submit this declaration in support of Cisco Systems, Inc.’s (“Cisco”)
 10 Administrative Motion to File Documents Under Seal (Docket No. 323), which moves the Court
 11 for an order to file under seal the following item related to non-party Juniper:

12 • Pages 178-79 of Exhibit L to the Declaration of Andrew M. Holmes in Support of
 13 Cisco’s Motion for Protective Order.

14 In this declaration, I explain why the material cited above is sealable pursuant to Civil Local Rule
 15 79-5 and provide additional facts in support of Cisco’s Administrative Motion to File Documents
 16 Under Seal to the extent that the administrative motion pertains to Juniper.

17 3. Pages 178-79 of Exhibit L contain direct citations of and references to the
 18 deposition of Phil Kasten as Juniper’s corporate designee pursuant to a subpoena served on
 19 Juniper by Arista. The transcript reflects substantive discussion of the technical development of
 20 Juniper’s highly proprietary software and source code—which contains much information that
 21 Juniper maintains as trade secrets. Juniper expends significant effort in maintaining the secrecy of
 22 its software and source code development, including, for example, implementing strict screening
 23 procedures for visitors to its engineering campus. Public disclosure of essential nonpublic facts
 24 about Juniper’s software and source code development could materially impair Juniper’s
 25 intellectual property rights and could cause serious competitive consequences to Juniper’s
 26 business positioning.

27 4. For these reasons, there is good cause to seal pages 178-79 of Exhibit L.

28 [Signature page follows]

1 Executed on July 6, 2016, at Los Angeles, California.

2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct to the best of my knowledge.

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5 /s/ Joshua Glucoft

6 Joshua Glucoft

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